domains and applying human expertise to the gathered information are computer automated/assisted, the method comprising the steps of:

integrating within a single database business information spanning multiple business domains;

formalizing a decision-making algorithm that uses information spanning multiple business domains;

responsive to a user action, triggering the decision-making algorithm and performing at least one of the following: 1) presenting to the user results of the decision-making algorithm; and 2) making a database entry enabling a subsequent business process to be performed.

~~123~~. (New) The method of claim ~~122~~, wherein the business task is selected from the following group: invoice collection, invoice payment, and return authorization request processing.

REMARKS

The Office Action of February 16, 2000 has been carefully considered. In response thereto, the claims have been amended as set forth above. Withdrawal of the rejection and allowance of the present application in view of the foregoing amendments and the following remarks is respectfully requested.

The allowance of claims 107, 108 and 114-118 is appreciatively acknowledged. Claim 97 was also indicated as containing allowable subject matter, which indication is appreciatively acknowledged.

The specification and claims have been amended to correct various informalities noted in the Office Action. The Examiner's helpfulness in this regard is appreciated. Also, a copy of the microfiche appendix is submitted herewith.

Claims 109-112 were rejected as being unpatentable over Sellers. Claims 82-96 and 98-106 were rejected as being unpatentable over Sellers in view of Cupps. Claim 113 was rejected as being unpatentable over Sitarski.

Claims 82, 91, 95, 109 and 110 have been amended to more clearly distinguish over the cited references. With respect to those claims not amended, the foregoing rejections are traversed. Reconsideration is respectfully requested.

Each of the independent claims will be considered in turn.

Claim 82

Claim 82 relates to a feature in accordance with which a web user during a first session selects a product and stores that product within a product collection on the web. The user later, during a subsequent session, causes the product collection to be retrieved.

Unlike the present invention, Sellers does not relate to business-to-business electronic commerce. Rather, Sellers relates to an operations logistics automation system for consolidating and making readily available information relating to various aspects of product development and manufacturing. Sellers does not at all relate to electronic business-to-business *sales*, but does describe electronic tracking of purchase information as it relates to *manufacturing procurement*. Because of its manufacturing procurement focus, in Sellers, suppliers are preset and cannot be readily changed. Hence, it may be seen that both the use and users of the system of the present invention, on the one hand, and the system of Sellers, on the other hand, are completely different.

	USE	USERS
INVENTION	Business-to-business electronic commerce	A merchant and that merchant's "e-business sphere": community of customers and vendors
SELLERS	Operations logistics automation automation, including manufacturing procurement	Engineers, managers, compliance officers, etc., of a single business

Claim 82 distinguishes the present business-to-business electronic commerce system from business-to-consumer electronics commerce systems. In business-to-consumer

systems, the decision maker and the "electronic shopper" are one and the same. Furthermore, for the most part, each purchase is unique. In business-to-business systems, the situation is much different. Decision-makers and shoppers are not the same. Moreover, purchases are often repetitive, or "variations on a theme". In the latter environment, the ability to create, store and retrieve product collections on the web becomes very important to be productive and reduce repetitive labor.

Claim 82 has been amended to recite that a product collection created by a web user representing a first business is electronically communicated to a second different business.

The portion of Sellers cited in relation to claim 82 relates to the teaching of *static* blanket purchase orders for manufacturing procurement. Despite the convenience of having such information consolidated with other operations logistics information and susceptible to easy retrieval, the fact remains that this feature is a "book-keeping convenience" only and is not used to actually effect business.

Note in particular lines 38-40 of col. 70 of the reference: "The system keeps track of the quantity and cost of the orders being released. It issues a warning when the total to-date reaches the maximum limit."

The orders referred to are orders for raw materials of a manufacturer using the Sellers system for operations logistics and manufacturing procurement. No mention is made of automation of the orders themselves (let alone linking together orders, invoices, returns, etc.); only automation of *order tracking*, or book-keeping, with respect to "orders being released," presumably in some conventional, largely-manual fashion.

The combination of Cupps with Sellers does not make out a prima facie case of obviousness. Even if Sellers related to business-to-business electronic commerce, which it does not, Cupps relates to *business-to-consumer* electronic commerce. In business-to-consumer electronic commerce, the need for the invention of claim 82 hardly arises.

Assuming for purposes of argument that it would have been obvious to put Sellers' system on the web, the purpose for doing so, consistent with the spirit of Sellers, could only be to serve the information tracking and retrieval needs of the global enterprise. Doing so would not change the fact that Sellers just does not do e-commerce and hence contains no hint or suggestion of the subject matter of claim 82.

Claim 91

Claim 91 relates to the ability of a web user to create product collections by derivation from existing stored product collections. As explained previously, in business-to-business electronic commerce, purchases are often repetitive, or variations on a theme. The ability to place a new order by copying a previous order and possibly modifying that order becomes a substantial time-saving convenience. Based on the foregoing discussion of Sellers, one can appreciate that Sellers does not teach or suggest any such feature.

The rejection states:

> Since, Sellers teaches that multiple item collections (specifications) are created then the it would have been obvious to a person of ordinary skill in the art at the time of Applicant's invention to have included the item collections being related by derivation because such a modification would save time by allowing the newly item collection to maintain the same characteristic as the item collections that is derived from.

However, claim 91 as amended recites that the item collections are used to electronically communicate at least one of supply and demand information from a first business to a second business. As discussed previously, neither Sellers nor Cupps teaches or suggests any such feature.

The invention of claim 91 makes possible the use of a common base document as the foundational document for virtually all day-to-day electronic business interactions, without the need for complicated, preset infrastructure (as in EDI--Electronic Data Interchange--for example). This in turn makes possible a dramatic simplification of business-to-business electronic commerce, to such a degree that relatively unsophisticated workers can work productively and efficiently with a minimum of training to achieve high per-worker revenues.

Claim 95

Claim 95, as amended, relates to a "self-help" web customer service feature in which a web customer can directly cause a customer service/return record to be created in a database, to be processes by a merchant. No such feature is taught or suggested by Sellers/Cupps. Self-service web return/service requests make possible the world-wide return of goods without the need for paper and pencil and without the need to remember transaction details.

The cited excerpt of Sellers regarding returns again describes only automation of returns tracking, or book-keeping. Sellers does not mention the actual communication of a return or service request from customer to merchant and how the return or service process is "kicked-off". It in no way teaches or suggests the web self-service feature of claim 95. The same also holds true of Cupps.

Claim 109

Claim 109 is logically related to claim 95 and will therefore be discussed out-of-turn. Whereas claim 95 relates to the self-service creation of a return/service request, claim 109 relates to the *automatic approval* of such a request based on customer-specific criteria. That is, given otherwise identical circumstances, customer A's return/service requested may be approved and customer B's return/service request may be denied. Automatic approval enables very tangible cost savings and consistent results across a wide variety of circumstances (because human involvement is removed), and increased customer satisfaction (because of the availability of instant approval). No such feature is taught or suggested in the cited references.

The rejection states in part, "Sellers teaches...automatically approving the request (col. 75, lines 11-18)". Applicant respectfully disagrees. In general, whenever Sellers refers to a "conversation" such as the Receipts/Corrections conversation here, what is referred to is simply a manual data entry procedure using a particular screen layout or data entry screen. Such a procedure would be used following manual (and costly) *ad hoc* handling of a return/service request, for example. Sellers contains no hint or suggestion of automatic approval of return/service requests.

(11/98)

Claim 109 has been amended to further recite electronically communicating approval to the customer. This feature is also absent from the cited references.

Claim 100

Claim 100 relates to the "common document" feature alluded to previously, i.e., the use of a common base document as the foundational document for virtually all day-to-day interactions. One type of document, having consistently the same elements, can serve as a type of shorthand to capture all commercially relevant information for a wide range of transactional situations.

Conventionally businesses have a myriad of different forms, one for quotes, one for purchase orders, etc., resulting in substantial complexity. By contrast, the present system relies in large measure on a single electronic "form" that is "tweaked" to allow it to serve different functions at different stages of the business process, hence serving the goal of unified global commerce.

In relation to this feature, the Office Action stated, "Sellers teaches a business-to-business electronic commerce system [and] obtaining from multiple parties demand information specifying an item to be subject of a transaction," relying on col. 70, lines 30-40.

Sellers does not teach a business-to-business electronic commerce system. Rather, what Sellers teaches is a comprehensive enterprise information system with no transactional intelligence or capabilities. Sellers does not even recognize the need for the invention of claim 100, let alone teach or suggest the same.

Claim 110

Claim 110 relates to efficient purchasing in an electronic commerce system. The invention of claim 110 allows a reseller, for example, to issue a single purchase order per vendor per day regardless of how many different customers place orders for good originating from that vendor. As recited in claim 110, demand information from multiple sources is grouped while retaining a distinct record of individual demand information. One processing step (e.g., purchasing) is performed using the grouped demand information.

(11/98)

Claim 110 has been amended to recite that grouped demand information is communicated to a third party, e.g., an outside vendor. Another processing step (e.g., receiving, shipping) is performed using the individual demand information.

The rejection states:

Sellers does not specifically teach grouping the demand information and performing another step using the grouped demand information. Official notice is taken that is old and well known in the marketing industry to group demand information on customers such as what coupons a particular group of people are redeeming which the marketers will use to targeted a group of people. It would have been obvious to a person of ordinary skill in the art at the time of Applicant's invention to have included grouping the demand information and processing using the grouped demand information to better serve a group of people's demand.

Regardless of the accuracy of the foregoing observation, the fact remains that Sellers does *not* teach a business-to-business electronic commerce system and does not have a marketing focus. In point of fact, a need for the invention of claim 110 does not arise even in most business-to-business electronic commerce applications where a physical inventory model is followed. Conventionally, orders are received electronically and filled from physical inventory. Hence Amazon.com, for example, probably the quintessential example of a dot-com retailer, spends billions of dollars on warehousing operations.

In the case of a reseller operating in accordance with a "virtual inventory" (or zero inventory) model, the situation is much different. The reseller can only fill an order by placing an order. Placing an order for every order received, however, is inefficient. The problem becomes one of consolidating demand information for some purposes and retaining distinct demand information for other purposes (e.g., shipping and receiving automation). The present specification discloses an advantageous arrangement for doing so.

Applicant submits that Sellers in no way teaches or suggests the subject matter of claim 110, and that it would not have been obvious to one of ordinary skill in the art to "graft on" to Sellers, functionality that Sellers had no inkling of or need for to begin with.

(11/98)

Claim 113

Claim 113 relates to what may be described as the "indivisibility principle" of the present invention. In prior art business software, different portions of the business process are automated piece-meal by different software packages, resulting in functional segmentation (e.g., sales, accounting, etc.). It is largely because of such functional partitioning that the need for systems integration arises. For example, if you have an order management application from Vendor A and a warehouse management application from Vendor B, you have to make sure the interface to Vendor B's application holds up after a revision to Vendor A's.

The present invention takes the opposite tack. Instead of functional segmentation, in the invention of claim 113, all current records required to perform a *full spectrum of business functions* throughout a life cycle of each product item are stored within a single database. The fact that a single database may not have sufficient capacity to store all such records for all business partners is not allowed to compromise the foregoing principle. The result is, instead of functional segmentation, segmentation by business partner or groups of business partners.

The Office Action stated:

> With respect to claim 113, Sitarski teaches storing within a database, in
> accordance with a single database schema, all current records required to perform
> a full spectrum of business functions throughout a life cycle of each product item
> (col. 5, lines 59- col. 6, lines 1-17); and limiting a number of persons for which
> current records are stored within the database (col. 5, lines 33-40). Sitarski does
> not specifically teach that the limitation is on the business partners. Nevertheless,
> official notice is taken that is old and well known to have limited partners wherein
> they are not involved in management decisions. It would have been obvious to a
> person of ordinary skill at the time of Applicant's invention to have included
> limiting a number of business partners for which current records are stored in the
> database because such a modification would detail the rights and the
> responsibilities of the business partners.

Sitarski relates to the use of spatial displays pertaining to scheduling or planning any manufacturing operation in which the resources transform a material or consist of a series of transformations called processes and which involves the flow or movement of materials.

The techniques described in Sitarski are adaptable to the "supply chain management" business process segment. Sitarski, however, in no way teaches or suggests an *end-to-end* solution as described in claim 113, including such necessary functions as sales, accounting, customer service, etc. Sitarski clearly subscribes to the functional segmentation model of business software as opposed to the indivisibility principle of claim 113.

With regard to the feature of "limiting the number of business partners for which current records are stored in the database," some clarification may be in order. This step is wholly unrelated to the legal concept of a "limited partner" mentioned in the Office Action. This step is simply meant to reinforce the notion that segmentation, which is a necessary incident of hardware limitations, should be with respect to "business *partners*" (i.e., customers and/or vendors) and *not* with respect to business *process* as in the prior art, and Sitarski in particular.

Claims 121 and 122

New independent claims 121 and 122 are presented herewith. Claim 121 relates to the ability to perform a full spectrum of business functions via the Web, using a database having stored therein in accordance with a single database schema, all current records required to perform a full spectrum of business functions throughout a life cycle of each product item.

Claim 122 relates to a quality of intelligence exhibited during use of the present system. In particular, business decisions normally made by an experienced human decision maker by gathering information across multiple business domains and applying human expertise to the gathered information are computer automated/assisted by: integrating within a single database business information spanning multiple business domains; formalizing a decision-making algorithm that uses information spanning multiple business domains; and responsive to a user action, triggering the decision-making algorithm.
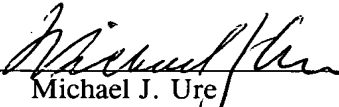
These features are not believed to be taught or suggested by the prior art of record.

Accordingly, claims 82, 91, 95 100, 109, 110, 113, 121 and 122 are believed to patentably define over the cited references. Claims 83-90, 92-94, 96-99, 101-106, 111 and 112 are also believed to add novel and patentable subject matter to their respective independent claims. Claims 107, 108 and 114-118 have been allowed. Withdrawal of the rejections and allowance of claims 82-123 is respectfully requested.

Respectfully submitted,

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